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16 Counter-Defendant M. DIANE KOKEN

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

M. DIANE KOKEN,
Plaintiff,

v.

STATECO INC. d/b/a STATECO
INSURANCE SERVICES and THOMAS
NATOLI, and XYZ CORPS. 1-10, and DOES
1 through 10, inclusive,

Defendants.

AND RELATED CROSS-ACTION

Case No.: 5:05-cv-03007-JF

**STIPULATION AND [PROPOSED]
ORDER CONTINUING HEARING
ON PLAINTIFF'S MOTION TO
DISMISS DEFENDANTS' SECOND
AMENDED COUNTERCLAIM**

Plaintiff and Specially Appearing Counter-Defendant M. Diane Koken ("Plaintiff")
and Defendants and Counter-Claimants Stateco Inc., doing business as Stateco
Insurance Services, and Thomas Natoli (collectively "Defendants") by and through their
undersigned counsel, stipulate as follows:

1. WHEREAS Defendants filed their Second Amended Counterclaim on or
about May 2, 2006; and
2. WHEREAS Plaintiff filed her Motion to Dismiss Second Amended

1 Counterclaim of Defendants on or about February 1, 2007; and

2 3. WHEREAS the hearing on Plaintiff's motion was scheduled for May 4,
3 2007; and

4 4. WHEREAS because Plaintiff's counsel will be out of the country, Plaintiff
5 requested, and Defendants agreed to, a continuance of the hearing date; and

6 5. WHEREAS the extension requested by Plaintiff will not affect any court-
7 ordered deadlines;

8 IT IS PROPOSED AND STIPULATED:

9 The hearing date on Plaintiff's Motion to Dismiss Second Amended Counterclaim
10 of Defendants shall be continued to June 15, 2007 at 9:00 a.m.

11 IT IS SO STIPULATED.

13 DATED: April 26, 2007

BERLINER COHEN

15 By Laura Palazzolo
16 Laura Palazzolo
17 Attorneys for Defendants and Counter-
18 Claimants STATECO INC., dba STATECO
INSURANCE SERVICES and THOMAS
NATOLI

19 DATED: April _____, 2007

SCHIFF HARDIN LLP

21 By _____
22 Wilson K. Park
23 Attorneys for Plaintiff and Specially
Appearing Counter-Defendant M. DIANE
KOKEN

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STIPULATION AND [PROPOSED] ORDER CONTINUING HEARING ON PLAINTIFF'S MOTION TO DISMISS DEFENDANTS'
SECOND AMENDED COUNTERCLAIM

Counterclaim of Defendants on or about February 1, 2007; and

3. WHEREAS the hearing on Plaintiff's motion was scheduled for May 4, 2007; and

4. WHEREAS because Plaintiff's counsel will be out of the country, Plaintiff requested, and Defendants agreed to, a continuance of the hearing date; and

5. WHEREAS the extension requested by Plaintiff will not affect any court-ordered deadlines:

IT IS PROPOSED AND STIPULATED:

The hearing date on Plaintiff's Motion to Dismiss Second Amended Counterclaim of Defendants shall be continued to June 15, 2007 at 9:00 a.m.

IT IS SO STIPULATED

DATED: April , 2007

BERLINER COHEN

By _____
Laura Palazzolo
Attorneys for Defendants and Counter-
Claimants STATECO INC., dba STATECO
INSURANCE SERVICES and THOMAS
NATOI

DATED: April 21, 2007

SCHIFF HARDIN LLP

By Wilson Park
Wilson K. Park
Attorneys for Plaintiff and Specially
Appearing Counter-Defendant M. DIANE
KOKEN

1 IT IS SO ORDERED
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DATED: May 1, 2007

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5 By 
Honorable Jeremy Fogel
6 United States District Court Judge
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